EPA has not conducted a complete, scientific evaluation of this chemical as required by 40 C.F.R. 158.

Failure to assess the combined active ingredients intended for approval
EPA's analysis fails to address risks, as required by 40 C.F.R. 158, of the combined effects of both active ingredients 2,4-D choline salt combined with glyphosphate. The toxicity to human health and the environment of the individual compounds can not be assumed to be the same as the combined formulation.

Failure to assess the risk to human health and the environment due to the concentration of Dioxin in 2,4-D Choline
The EPA fact sheet states that dioxin contamination, a known and very toxic class A carcinogen, was a contaminant in agent orange, 2,4,5-T and is not associated with 2,4-D. This is not true. Of the very sparse EPA information that is publically available at http://www.epa.gov/espp/litstatus/effects/redleg-frog/2-4-d/appendix-e.pdf shows 2,4 D contains dioxin. There are numerous studies and information cited in the Journal of Pesticide Reform http://www.signaloflove.org/clearcutting/reports/24D.pdf with information contradicting EPA's fact sheet statement. The evaluation of the use of 2,4-D should include sampling for all dioxin congeners and include a complete multipathy way risk assessment for dioxin constituents in 2,4-D choline salt.

Failure to address data gaps and provide the public with the opportunity for review

The January 15, 2013 docket memorandum, PC Code 051505 identifies that there was insufficient information to determine direct risks to mammals, birds, reptiles, terrestrial-phase amphibians, and terrestrial plants. This same document identifies a number of uncertainities and information gaps with 2,4-D choline regarding the fate and ecological toxicity. This information must be provided for public review before this chemical is approved for use.

Page 67 of this document lists uncertainties with the risk assessment. This section states that the Tier I endocrine disruptor screening as required by FFDCA section 408(p) were not yet available. This information must be provided to the public for review and has not been. Section 5.3.1 of this report identifies a number of data gaps that do not appear to be addressed. This information should be provided to the public for review.

EPA Memorandum dated October 27, 2011 PC Codes 051505, 030001; Decision number 442244 regarding the residue for field corn. Identifies a number of pieces of information/data that were not provided. Follow-up to items in this memo sold be provided for public review. Page 4, under the heading of Regulatory Recommendations states that a human health risk assessment is forthcoming but was not included in the docket for public review. This should be provided for public review before this chemical is approved for use on grains for human consumption. Page 23 of this analysis states that no new tolerances are necessary to support this new use but the tolerance fails to include both active ingredients in the tolerance limit development.

As the numerous comments that have been submitted by various organizations to date have already pointed out that: Studies in humans have reported associations between exposure to 2,4-D and non-Hodgkin's lymphoma; animal studies show that 2,4-D exhibits hormone-disrupting activity and effects the function of neurotransmitters dopamine and serotonin resulting in numerous birth defects and neurological damage; 2,4-D contains dioxin and known carcinogen; the aggregate risk due to the increased use should be evaluated; EPA should not proceed given the uncertainty of the

synergistic effect of the combined active ingredients, the uncertainty and data gaps that still exist with both chemicals separately and the lack of ability to monitor and continually assess the dioxin concentration in 2,4-D.

Finally, to address overspray EPA has suggested a monitoring program. It is unclear how a program like this could be implemented or enforced.
I am opposed to the increased use of genetically modified organisms (GMOs). By allowing the registration of Enlist-Duo, the combination of 2,4-D choline with glyphosate for several new designer seeds, the EPA is not taking an informed scientific approach. Inadequate information has been provided to the public to ensure there is not an increased risk to human health or the environment due to the use of two active ingredients in this new product. No information has been provided on the synergistic toxicity, the mobility in air and water, or application rates for the combination of glyphosate and 2,4-D choline. The toxicity of this compound must be assessed before EPA allows widespread use on our food, in our fields, for feed of our animals.